



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

# Port Townsend Paper Corp. Modified Air Operating Permit: Public Meeting & Public Hearing

---

## Department of Ecology / Industrial Section

**Bari Schreiner, hearing officer**

**Merley McCall, Ecology Industrial Section manager**

**Marc Heffner, Ecology Industrial Section engineer**

**June 2, 2009**

# Agenda

- 7 p.m. Introduction
  - Bari Schreiner/hearing officer
- 7:05 Public Meeting  
(Presentation/Q&A session\*)
  - Merley McCall/ Ecology Industrial Section manager
  - Marc Heffner/Ecology Industrial Section engineer
- 8:30 Public Hearing  
(Formal testimony)
  - Bari Schreiner/hearing officer

\*Ecology staff will spend as much time as necessary to answer your questions.

# Tonight's Purpose

- Provide overview and receive comment on four documents:
  - Modified air operating permit
  - Support Document
  - Support Document Supplement
  - Consolidated Air Order #2892
- Discuss progress of Agreed Order #5771 (not part of comment period).
- Answer your questions.

# Tonight you can

- Learn about proposed changes to the air permit and associated documents.
- Ask questions.
- Sign up and testify during the hearing portion.
- Provide your written comments by 5 p.m., June 15, 2009.
  - By fax, e-mail or regular mail
  - In writing tonight (comment cards available)

**Ecology will consider all comments and evaluate how they may further amend the draft permit under review.**

# What is an air operating permit?

- Delegated responsibility to Ecology.
- Issued every five years.
- Required of facilities that emit large amounts of air pollutants.
- Is a legally enforceable document.
- Compiles applicable federal and state laws, rules and orders into one document, which:
  - Requires monitoring, testing and record keeping for specified emissions.
  - Requires regular reporting, annual statement by mill that it met (or not) its air requirements in the permit.
- Gives Ecology authorities to set additional monitoring requirements to assure compliance.

# What is an air operating permit? (cont.)

- Provides the public with legal options if the mill doesn't comply with its air emissions limits.
- Required for the mill to operate.
- Permit can't include additional limits or standards outside federal/state law *unless* written into a legal order and put into effect.

# History of PT Paper air permit

- Ecology reissued the permit in January 2007.
- Appealed to Pollution Control Hearings Board (PCHB).
- In January 2008, the PCHB directed Ecology to consider EPA's comments.
- Ecology modified the permit, is presenting the draft for public review and comment now.

# EPA's comments

- The EPA identified three areas of concern with the permit Ecology issued in 2007.
  - Ecology reviewed the EPA's comments, consulted with EPA staff and agreed to address the concerns.
  - Draft permit includes changes to the appropriate sections of the permit.
  - Changes are consistent with federal regulations.



# EPA's comments

- **First issue**

- Federal Compliance Assurance Monitoring (CAM) rule requirements were not properly included for four emission units.

- **Resolution**

- Discussed the applicability of CAM in the Support Document Supplement.
- Added CAM requirements in Section J of the permit.

# EPA's comments

- **Second issue**

- Emission limits and monitoring requirements for sulfur dioxide from Power Boiler 10 did not meet federal requirements.

- **Resolution**

- Corrected limit-significant digits (e.g. change from 0.8 to 0.80) and removed averaging period.
- Specified sampling requirement and analytical method for oil.
- Explained method of limit calculation in the Support Document Supplement.
- Removed references to obsolete regulations and requirements. (Note: this required a change in the consolidated order.)

# EPA's comments

- **Third issue**

- Requirements for biological treatment of wastewater in the treatment ponds included an incorrect statement and incomplete monitoring requirements.

- **Resolution**

- Removed erroneous statement from permit.
- Specified continuous monitoring requirement.
- Added correct regulation citation to permit.

# Effect of changes

- The changes make the three areas of concern consistent with federal regulations.
  - Monitoring requirements are clarified
  - Federal requirements are properly cited



# Other documents for public comment

- **Support Document** explains some of the legal and technical issues Ecology considered when writing the permit. (No changes from 2007)
- **Support Document Supplement** summarizes the modifications Ecology made to this draft permit.
- **Air Order 2892** includes some of the limits and requirements in the permit (only modifications open for comment).

# What we've heard

- Chief concerns
  - Nuisance odors from the mill
  - Possible health impacts from air emissions that aren't reported
- Other concerns
  - Increased accountability for the mill and Ecology when citizens phone in odor complaints
  - Department of Ecology enforcement

# Ecology's response to concerns

- **Supported** state Department of Health's analysis of health risk data (health consultation) to assess possible impacts.
- **Negotiated** an agreed order (5771) with the mill to get:
  - Meteorological station ([www.ptpc.com/community/shtml](http://www.ptpc.com/community/shtml))
  - Hazardous Air Pollutants from the five primary emission units
  - Measurement of emissions from the wastewater treatment ponds
  - Improved response to complaints
- **Provided** mill data to EPA for new nationwide "residual risk assessment" study underway now.



# Ecology's response to concerns

- Meet with individuals, groups to hear concerns
- Signed memorandum of understanding with local air agency (ORCAA) to observe conditions at the mill when they are in the vicinity
- Established a toll-free number for callers to report odor events to Ecology on evenings and weekends – 800-453-4951
- Evaluating requests outside jurisdiction of air permit (e.g. options for ambient monitoring)
- Working with the mill on making changes in the conditions and operation of the wastewater treatment basin



# Ecology's response to concerns

- Worked with the mill and National Council of Air and Stream Improvements to convince EPA to include these data in the EPA's new residual risk assessment modeling.



# Ecology's next steps

1. Public comment closes at 5 p.m., June 15, 2009.
2. Review and consider all comments for possible changes to permit language.
3. Complete *Response to Comments*.
4. Send permit to EPA for a 45-day review period once air permit language is considered final by Ecology.
5. Issue air permit. Effective for five years.

# Your rights

- Once issued, you can appeal the modified permit to the Pollution Control Hearings Board.
  - Must happen within 30 days of being issued.
  - Permit remains in effect during appeal.
- Petition EPA to object to the permit.
- Review Ecology file of mill records.

# Web page / Complaint Line

- Evenings and weekends, call 800-453-4951 to report odor complaints
- Weekdays, call Ecology and the mill
  - Ecology: 360-407-6773
  - PT Paper: 360-379-4224 or e-mail them at [community\\_relations@ptpc.com](mailto:community_relations@ptpc.com)
- [http://www.ecy.wa.gov/programs/swfa/industrial/pulp\\_porttown.html](http://www.ecy.wa.gov/programs/swfa/industrial/pulp_porttown.html)

# Questions?

- Merley McCall, Industrial Section manager
  - 360-407-6929 or memc461@ecy.wa.gov
- Marc Heffner, Industrial Section engineer
  - 360-407-6773 or mhef461@ecy.wa.gov
- Angela Fritz, Industrial Section public involvement
  - 360-407-7393 or anfr461@ecy.wa.gov

---

**Send written comment by June 15, 2009 to:**

Washington Dept. of Ecology  
Marc Heffner/Industrial Section  
PO Box 47600  
Olympia, WA 98504-7600  
Fax: 360-407-6102